

**UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF NEW YORK**

SHANKAR NARAINÉ,
*Individually, and on behalf of all others
similarly situated,*

Plaintiff,

v.

AUTOMOBILE WORKFORCE LLC, d/b/
a GENERAL WORKFORCE,
Defendant.

1:18-cv-06696-MKB-SMG

**STIPULATION EXTENDING
DEFENDANT'S TIME TO ANSWER OR
OTHERWISE MOVE**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for plaintiff Shankar Naraine ("Plaintiff") and defendant Automobile Workforce LLC, d/b/a General Workforce, ("Defendant"), that Defendant shall have until January 31, 2019 to answer, move or otherwise respond to the Complaint filed by Plaintiff on or about November 23, 2018 (hereinafter "Complaint"). There has been no previous request for an extension of time to respond to Plaintiff's Complaint in this matter.

IT IS FURTHER STIPULATED AND AGREED that Defendant hereby waives the affirmative defense of defective service of process with respect to Plaintiff's Complaint and agrees to accept service thereof.

By: Abdul Hassan
Abdul K. Hassan, Esq.

**ABDUL HASSAN LAW GROUP
PLLC**
*Attorneys for Plaintiff Shankar
Naraine*
215-28 Hillside Avenue,
Queens Village, NY 11427
(718) 740-1000

DATED: New York, New York
December 14, 2018

By: T. Bryce Jones
T. Bryce Jones, Esq.

JONES LAW FIRM, P.C.
*Attorneys for Defendant Automobile
Workforce LLC, d/b/a General
Workforce*
450 7th Avenue, Suite 1408
New York, NY 10123
(212) 258-0685

DATED: New York, New York
December 14, 2018